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February 26, 2025

VIA ELECTRONIC CASE FILING

The Honorable Margaret M. Garnett
United States District Court Judge
United States District Court
Southern District of New York
300 Quarropas Street, Room 530
White Plains, New York 10601

Re: Riccitelli v. Johnson Controls, Inc.
Case No.: 24-cv-3243 (MMG)

Pagano v. Johnson Controls, Inc.
Case No.: 24-cv-1020 (MMG)

Halfter v. Johnson Controls, Inc.
Case No.: 24-cv-1047 (MMG)

Your Honor:

This firm is counsel to Plaintiff in the matter of Riccitelli v. Johnson Controls, Inc. Case No.: 24-cv-3243 (MMG). We write to respectfully request a one (1) week extension of time to prepare the submission required under the Court's Order of February 25, 2025. Pursuant to the Court's Order, I have conferred with counsel for Plaintiff in the matters of Pagano v. Johnson Controls, Inc., 24-cv-01020 (MMG) and Halfter v. Johnson Controls, Inc., 24-cv-01047 (MMG). The Parties have commenced discussions regarding their respective positions on the issues raised in the Court's Order. However, due to pre-existing scheduling conflicts of Counsel, we believe additional time is necessary to finalize and file a submission. Notably, Saul D. Zabell, lead counsel for the Plaintiff in the *Riccitelli* matter, is presently out of the state until next week. Counsel also have other conflicts early next week that could prevent coordination of a joint statement that addresses the specific concerns of all three (3) Plaintiffs. Accordingly, we request that the deadline for joint submission be extended to March 11, 2025.



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The parties thank the Court for its time and attention to this matter. We remain available should the Court seek additional information in connection with this submission.

Respectfully submitted,

ZABELL & COLLOTTA, P.C.

Ryan Eden
Ryan M. Eden

cc: Client
All Counsel of Record (via Electronic Case Filing)
Heidi Sharp, Esq. (Via Electronic Mail)

Application GRANTED. The parties' joint letter regarding the effect of *Novin* shall be due no later than **March 11, 2025**. The Clerk of Court is respectfully directed to terminate Dkt. No. 16 in *Riccitelli*.

SO ORDERED. Date: 2/27/2025.


HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE